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May 16, 2024

Via ECF

Hon. Alvin K. Hellerstein
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

***Re: Pizarro v. Euros El Tina Restaurant Lounge and Billiards Corp., 20-cv-05783-AKH
Opposition to Motion for Stay***

Dear Judge Hellerstein:

I am the attorney for Plaintiff-Counterclaim Defendant Maria Jose Pizarro (“Ms. Pizarro”), and I write to oppose Mr. Quezada’s motion to stay Ms. Pizarro’s motion for summary judgment. Mr. Quezada’s pending bankruptcy should not stay this motion because the claims at issue are *for* the debtor, not against him. *See* 11 U.S.C. § 362(a)(1). Indeed, Ms. Pizarro’s claims were already fully adjudicated by a jury and affirmed by this Court. *See* Civil Docket Sheet, at Document No. 195. While Mr. Quezada’s attorney argues that Third Party Defendant Castro’s Motion for Summary Judgment includes a motion for sanctions, Ms. Pizarro made no such application as part of her motion for summary judgment. Without taking any position as to Mr. Castro’s motion for sanctions, Mr. Quezada cannot attempt to make any of those arguments with respect to Ms. Pizarro’s motion for summary judgment. Accordingly, Ms. Pizarro requests that the Court deny Mr. Quezada’s motion for a stay at least with respect to Ms. Pizarro’s motion so that the Court can dispose of Mr. Quezada’s frivolous claims and Ms. Pizarro can clear her name from Mr. Quezada’s false allegations.

Ms. Pizarro thanks the Court for its consideration herein.

Respectfully submitted,

/s/ Mark Marino

Mark Marino